UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

DAVID DOTZENROTH, SEQUOIA AIRCRAFT CONVERSIONS, LLC, CAI CONSULTING LTD, and CHARLES WILEY

DOTZENROTH,

- against -

: Case No.:

: Underlying Litigation:

Wagner Aeronautical, Inc. v.

Dotzenroth, No. 3:21-cv-00994-L-AGS

(S.D. Cal.)

District Judge: M. James Lorenz

Magistrate Judge: Andrew G. Schopler

FORTRESS INVESTMENT GROUP, LLC,

Movants,

Respondents.

NOTICE OF MOTION AND MOTION TO TRANSFER ENFORCEMENT OF TWO SUBPOENAS ON FORTRESS INVESTMENT GROUP, LLC TO THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF CALIFORNIA

PLEASE TAKE NOTICE, that upon the accompanying Declaration of Kenneth M. Fitzgerald, the exhibits thereto, the accompanying Memorandum of Law, and the paper and records on file in *Wagner Aeronautical, Inc. v. Dotzenroth*, No. 3:21-cv-00994-L-AGS (S.D. Cal.), Movants David Dotzenroth, Sequoia Aircraft Conversions, LLC, CAI Consulting Ltd., and Charles Wiley Dotzenroth, will move this Court, at a date and time to be determined, for an Order, pursuant to Federal Rule of Civil Procedure 45(d)(2)(B)(i) and (f), transferring enforcement of two subpoenas issued to Respondent Fortress Investment Group, LLC, from this Court to the Southern District of California.

Dated: November 24, 2021 New York, New York

JOSHUA L. SEIFERT PLLC

By: /s/ Joshua L. Seifert
Joshua L. Seifert, Esq.
18 West 18th Street
New York, New York 10011
646-470-2647
jseifert@seifertpllc.com